

Exhibit 13

Redacted





IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action No: 1:21-md-03010-FKC

IN RE GOOGLE DIGITAL
ADVERTISING ANTITRUST
LITIGATION

HIGHLY CONFIDENTIAL VIDEOTAPED VIDEOCONFERENCED
DEPOSITION OF [REDACTED]

June 13, 2024

1 A. Yes.

2 Q. Do you recall toggling the save
3 function on and off in chat?

4 A. I don't recall any specific times when
5 I personally toggled it off and on, but it was a long
6 time ago.

7 Q. Do you recall that there was a toggle
8 to save chats or not save them?

9 A. There was, yes.

10 Q. Do you recall how yours was set?

11 A. Is there a specific time period you're
12 referring to?

13 Q. Well, I'm asking if you have a
14 recollection at any time, and then we can get more
15 specific after that.

16 A. Oh. No, I don't remember specific
17 settings at specific times.

18 Q. Do you recall it ever being set to
19 save?

20 A. I don't recall a time when I personally
21 adjusted that toggle for a reason, no.

22 Q. Do you recall the default setting for
23 that toggle?

24 A. I recall that there was a default
25 setting, but I did not pay too much attention to what

1 it was at any particular time.

2 Q. And isn't it true that the default
3 setting allowed chats to be deleted after a certain
4 period of time?

5 MS. SALEM: Object to form.

6 A. I know that there was a setting that
7 made it inaccessible to us as a user. I don't really
8 know how that worked on the back end.

9 Q. (By Mr. Maya) Did you ever get any
10 training on when to toggle that setting to save
11 versus leaving it off?

12 MS. SALEM: And I'll just caution the
13 witness to answer to the extent he can without
14 revealing attorney-client communications.

15 A. I -- I don't recall a specific training
16 on that, no.

17 Q. (By Mr. Maya) Okay. Let's introduce
18 the next exhibit. This will be [REDACTED] Exhibit 5.

19 [REDACTED] Exhibit 5 was marked.)

20 THE WITNESS: Thanks.

21 Q. (By Mr. Maya) And this is basically a
22 two-page email string beginning with the Bates number
23 GOOG-DOJ-11766640 and ending with the Bates
24 number 66641.

25 A. Yes.